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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FRANK BACCALA,

Plaintiff;

vs.

ELDORADO RESORTS CORPORATION,  
a Florida corporation; MICHAEL MARRS;  
KRISTEN BECK; DOMINIC TALEGHANI;  
AND DOES 1-50, inclusive;

Defendants.

Case No.: 2:15-cv-00752-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO SUBMIT  
PRELIMINARY EARLY NEUTRAL  
EVALUATION ASSESSMENT  
STATEMENTS**

Pursuant to LR 6-1, 6-2 and 7-1 and 26-4, Plaintiff Frank Baccala ("Plaintiff") and Defendants Eldorado Resorts Corporation ("Eldorado"), Michael Marrs ("Marrs"), Kristen Beck ("Beck"), and Dominic Taleghani ("Taleghani") (sometimes hereinafter referred to collectively as "Defendants") by and through their undersigned counsel, hereby stipulate and agree to extend the time for the Parties to submit their Preliminary Early Neutral Evaluation Assessment Statements. Good cause exists for the proposed extension of time for the Parties to submit their Preliminary Early Neutral Evaluation Assessment Statements. Defendants filed Motions for Summary Judgment in four related matters on 3/16/2016. Each Motion for Summary Judgment is lengthy and has extensive Exhibits. Reviewing and identifying relevant evidence for each of Defendants' arguments amidst hundreds of pages of disclosures, deposition transcripts, etc., has proved to be much more time consuming than anticipated. Efforts to respond to the Motions

**STIPULATION AND ORDER TO EXTEND TIME TO SUBMIT PRELIMINARY  
EARLY NEUTRAL EVALUATION ASSESSMENT STATEMENTS**

1 have impeded Plaintiff's ability to prepare the Preliminary Early Neutral Evaluation Assessment  
2 Statements. In an effort to ensure Plaintiff can fully provide complete information on each case,  
3 the Parties have agreed that the deadline to submit the Preliminary Early Neutral Evaluation  
4 Assessment Statements should be extended in the following manner:

- 5 • All Parties shall submit their Preliminary Early Neutral Evaluation Assessment  
6 Statements to Judge Foley's Chambers as per the Order dated March 14, 2016  
7 (Doc. # 38) no later than **Friday, April 22, 2016**.

8  
9 Dated this 15th day of April, 2016.

10 WATKINS & LETOFSKY, LLP

11 /s/ Daniel R. Watkins  
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18 Attorneys for Plaintiff

Dated this 15th day of April, 2016.

OGLETREE, DEAKINS, NASH,  
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19 Attorneys for Defendants

18 **ORDER**

19 IT IS SO ORDERED.

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23 GEORGE FOLEY, JR.  
24 United States Magistrate Judge

25 Dated: April 18, 2016  
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